

#### REMARKS

Claims 1-9, 12, 16, 21, 22, and 39-46 are pending, and stand rejected.

Herein, the specification is amended at page 20. The amendment puts in words a feature shown in Figs. 5-7. No new matter is added. In an accompanying Request to Amend Drawings, a reference number is added to Figs. 5-7.

In addition, claims 1-4, 6, 8, 9, 12, 16, 21, 22, 39, 40, and 42-46 are amended. Claims 47-52 are added.

#### A. Rejections for Anticipation by Lo et al. and Foster

Claims 1-9, 12, 16, 21, 22, and 39-46 are rejected under 35 U.S.C. 102(e) as anticipated by both U.S. Patent Application Publication 2002/0014689 to Lo et al., and U.S. Patent 6,437,449 to Foster. The rejections are traversed, on grounds that neither Lo et al. nor Foster are prior art.

The present application claims priority to Korean Patent Application 2001-12326, which was filed in Korea on March 9, 2001, prior to the filing dates of both Lo et al. and Foster. To substantiate the claim for priority, a translation of Korean Patent Application 2001-12326 is enclosed herewith, accompanied by a Certificate of Translation of Foreign Priority Document under 37 CFR 1.55(a).

In view of the contents of Korean Patent Application 2001-12326, and its filing date before Lo et al. and Foster, it is submitted that the rejections over Lo et al. and Foster are overcome.

#### B. Rejections for Anticipation by LoBianco et al.

Claims 1-9, 12, 16, 21, 22, and 39-46 are rejected under 35 U.S.C. 102(b) as anticipated by U.S. Patent 6,340,846 to LoBianco et al. (hereinafter "LoBianco").

It is submitted that that the rejection under 35 U.S.C. 102(b) is erroneous, because LoBianco issued on January 22, 2002, after the present application was filed on December 12, 2001. Accordingly, the rejection under 35 U.S.C. 102(b) must be withdrawn.

Notwithstanding the above, independent claims 1, 21, and 39 are amended. Certain of amendments are made broaden the claims, e.g., by removing unnecessary limitations or means plus function formulations, certain of the amendments are made to clarify the claims without altering the scope of the claim (e.g., clarifying antecedent basis), and certain of the amendments (only as indicated below) are made to distinguish LoBianco.

For instance, claim 1 is amended to include the feature of:

an insulator coupled to and covering the entire first surface of the second semiconductor chip, wherein the insulator is coupled between the adhesive layer and the first surface of the second semiconductor chip.

This feature is exemplified in the present application by insulator 4 as shown in Figs. 1, 3, 4, and 5-7 of the present application, and in the specification at page 6, line 6 through page 7, line 4.

LoBianco lacks such "an insulator." Referring to LoBianco's Fig. 8, no single insulative layer covers the entire bottom surface of second die 16. This feature of claim 1 is not met by LoBianco's adhesive layer 52, spacer 50, or layer 42 of adhesive 40.

Claim 21 is amended to include the feature of:

an insulator coupled to the first surface of the second semiconductor chip, wherein the insulator is coupled between the first surface of the second semiconductor chip and the adhesive layer, and is between the first surface of the second semiconductor chip and each of the pads of the second surface of the first semiconductor chip.

This feature likewise is exemplified in the present application by insulator 4. LoBianco lacks such "an insulator." This feature of claim 21 is not met by LoBianco's adhesive layer 52, spacer 50, or layer 42 of adhesive 40.

Claim 39 is amended to include the feature of:

an insulator coupled between to the first surface of the second semiconductor chip and the first means, and overlying both the first means and the at least one first conductive wire.

This feature likewise is exemplified in the present application by insulator 4. LoBianco lacks such "an insulator." This feature of claim 39 is not met by LoBianco's adhesive layer 52, spacer 50, or layer 42 of adhesive 40.

The remaining claims depend on one of claims 1, 21, and 39, and overcome LoBianco for at least the same reasons as their respective independent claim.

#### C. New Claims 47-52

New claims 47-52 are added, without the introduction of new matter. The "sealing material" feature of claims 47-50 and 52 is supported by Figs. 5-7 of the application, and supporting text is added to the specification by amendment. The "insulator" of claims 50 and 51 is exemplified by insulator 4 of the present application.

LoBianco lacks a "sealing material" having all the features of claims 47-50 and 52. In Fig. 8, LoBianco's plastic body 60 is blocked from penetrating between the first and second dies 14, 16 by layer 42 of adhesive 40.

LoBianco also lacks a feature having all of the features of the "insulator" of claims 50 and 51, for reasons discussed above regarding claims 1, 21, and 39.

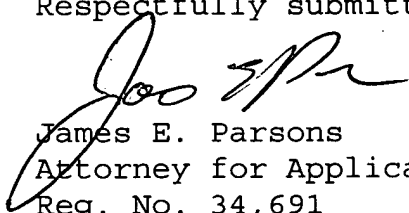
CONCLUSION

Claims 1-9, 12, 16, 21, 22, and 39-52 are pending in the present Application. Reconsideration and allowance of these claims is respectfully requested.

If there are any questions, please telephone the undersigned at (408) 451-5906 to expedite prosecution of this case.

Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the United States Postal Service as FIRST CLASS MAIL in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on December 9, 2003.

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